

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ALEJANDRO MANUEL ZAPATA OSORIO,  
ARTURO DEL RAZO, BRAULIO  
ROLANDO CASHABAMBA CHANGO,  
BYRON SALVADOR BARRERA  
SANCHEZ, CARLOS E. SIERRA  
RODRIGUEZ, EDWIN FABRICIO  
CASHABAMBA TUBON, JESUS SIERRA,  
JUAN SIERRA, RAMON ROSALES  
GALVEZ, RAUL CHAVEZ DIAZ,  
SEGUNDO LEANDRO ALULEMA  
GUANO, SEGUNDO NICOLAS  
SIGUENCIA ENCALADA, and WILDER  
RODRIGUEZ, *individually and on behalf of  
others similarly situated,*

*Plaintiffs,*

*-against-*

VECTOR STRUCTURAL PRESERVATION  
CORP. (D/B/A VECTOR STRUCTURAL  
PRESERVATION), NORTH STAR  
STRATEGY, INC. (D/B/A NORTH STAR  
STRATEGY), BILL HANDAKAS,  
VASSILIOS HANDAKAS, and SERGIO  
DOE,

*Defendants.*  
-----X

19-CV-04896 (LDH) (ST)

**NOTICE OF DEPOSITION  
PURSUANT TO FED. R. CIV. P. 30**

**NOTICE OF DEPOSITION OF PLAINTIFF BYRON SALVADOR BARRERA SANCHEZ**

PLEASE TAKE NOTICE that, pursuant to FED. R. CIV. P. 30, the testimony, upon oral examination of Plaintiff Byron Salvador Barrera Sanchez ("Plaintiff"), as an adverse party, will be taken before a notary public who is not an attorney, or employee of an attorney, for any party or prospective party herein, and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, via stenographic reporting, at the offices of Rabinowitz, Galina & Rosen, 94 Willis Avenue, Mineola, New York

11501, on the 28<sup>th</sup> day of October, 2020, at 1:00 P.M. in the afternoon of that day.

PLEASE TAKE FURTHER NOTICE that said Plaintiff is required to produce at such examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: All documents, electronically stored information, or objects relating to Plaintiff's employment with any of the named defendants and/or relating to Plaintiff's personal calendar (including, but not limited to, dates of other employment, vacations, illnesses, etc.) for the time period during which Plaintiff was employed by any of the named defendants.

Dated: August 29, 2020  
Mineola, New York

RABINOWITZ, GALINA & ROSEN  
*Attorneys for Defendants*

  
By: Michael M. Rabinowitz, Esq.  
94 Willis Avenue  
Mineola, New York, 11501  
Phone: (516) 739-8222  
[mrabinowitz@randglaw.net](mailto:mrabinowitz@randglaw.net)

TO: Michael Faillace, Esq.  
MICHAEL FAILLACE & ASSOCIATES, P.C.  
*Attorneys for Plaintiffs*  
60 East 42<sup>nd</sup> Street  
Suite 4510  
New York, New York 10165  
Phone: 212-317-1200  
[michael@faillacelaw.com](mailto:michael@faillacelaw.com)

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GUANO, SEGUNDO NICOLAS  
SIGUENCIA ENCALADA, and WILDER  
RODRIGUEZ, *individually and on behalf of  
others similarly situated,*

*Plaintiffs,*

*-against-*

VECTOR STRUCTURAL PRESERVATION  
CORP. (D/B/A VECTOR STRUCTURAL  
PRESERVATION), NORTH STAR  
STRATEGY, INC. (D/B/A NORTH STAR  
STRATEGY), BILL HANDAKAS,  
VASSILIOS HANDAKAS, and SERGIO  
DOE,

*Defendants.*  
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19-CV-04896 (LDH) (ST)

**NOTICE OF DEPOSITION  
PURSUANT TO FED. R. CIV. P. 30**

**NOTICE OF DEPOSITION OF PLAINTIFF ARTURO DEL RAZO**

PLEASE TAKE NOTICE that, pursuant to FED. R. CIV. P. 30, the testimony, upon oral examination of Plaintiff Arturo Del Razo ("Plaintiff"), as an adverse party, will be taken before a notary public who is not an attorney, or employee of an attorney, for any party or prospective party herein, and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, via stenographic reporting, at the offices of Rabinowitz, Galina & Rosen, 94 Willis Avenue, Mineola, New York 11501, on the 28<sup>th</sup> day of

October, 2020, at 11:00 A.M. in the forenoon of that day.

PLEASE TAKE FURTHER NOTICE that said Plaintiff is required to produce at such examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: All documents, electronically stored information, or objects relating to Plaintiff's employment with any of the named defendants and/or relating to Plaintiff's personal calendar (including, but not limited to, dates of other employment, vacations, illnesses, etc.) for the time period during which Plaintiff was employed by any of the named defendants.

Dated: August 29, 2020  
Mineola, New York

RABINOWITZ, GALINA & ROSEN  
*Attorneys for Defendants*

  
By: Michael M. Rabinowitz, Esq.  
94 Willis Avenue  
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Phone: (516) 739-8222  
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TO: Michael Faillace, Esq.  
MICHAEL FAILLACE & ASSOCIATES, P.C.  
*Attorneys for Plaintiffs*  
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Suite 4510  
New York, New York 10165  
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SIGUENCIA ENCALADA, and WILDER  
RODRIGUEZ, *individually and on behalf of  
others similarly situated,*

*Plaintiffs,*

-against-

VECTOR STRUCTURAL PRESERVATION  
CORP. (D/B/A VECTOR STRUCTURAL  
PRESERVATION), NORTH STAR  
STRATEGY, INC. (D/B/A NORTH STAR  
STRATEGY), BILL HANDAKAS,  
VASSILIOS HANDAKAS, and SERGIO  
DOE,

*Defendants.*  
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19-CV-04896 (LDH) (ST)

**NOTICE OF DEPOSITION  
PURSUANT TO FED. R. CIV. P. 30**

**NOTICE OF DEPOSITION OF PLAINTIFF CARLOS E. SIERRA RODRIGUEZ**

PLEASE TAKE NOTICE that, pursuant to FED. R. CIV. P. 30, the testimony, upon oral examination of Plaintiff Carlos E. Sierra Rodriguez ("Plaintiff"), as an adverse party, will be taken before a notary public who is not an attorney, or employee of an attorney, for any party or prospective party herein, and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, via stenographic reporting, at the offices of Rabinowitz, Galina & Rosen, 94 Willis Avenue, Mineola, New York 11501, on

the 28<sup>th</sup> day of October, 2020, at 2:00 P.M. in the afternoon of that day.

PLEASE TAKE FURTHER NOTICE that said Plaintiff is required to produce at such examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: All documents, electronically stored information, or objects relating to Plaintiff's employment with any of the named defendants and/or relating to Plaintiff's personal calendar (including, but not limited to, dates of other employment, vacations, illnesses, etc.) for the time period during which Plaintiff was employed by any of the named defendants.

Dated: August 29, 2020  
Mineola, New York

RABINOWITZ, GALINA & ROSEN  
*Attorneys for Defendants*

  
By: Michael M. Rabinowitz, Esq.  
94 Willis Avenue  
Mineola, New York, 11501  
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[mrabinowitz@randglaw.net](mailto:mrabinowitz@randglaw.net)

TO: Michael Faillace, Esq.  
MICHAEL FAILLACE & ASSOCIATES, P.C.  
*Attorneys for Plaintiffs*  
60 East 42<sup>nd</sup> Street  
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SEGUNDO LEANDRO ALULEMA  
GUANO, SEGUNDO NICOLAS  
SIGUENCIA ENCALADA, and WILDER  
RODRIGUEZ, *individually and on behalf of  
others similarly situated,*

*Plaintiffs,*

*-against-*

VECTOR STRUCTURAL PRESERVATION  
CORP. (D/B/A VECTOR STRUCTURAL  
PRESERVATION), NORTH STAR  
STRATEGY, INC. (D/B/A NORTH STAR  
STRATEGY), BILL HANDAKAS,  
VASSILIOS HANDAKAS, and SERGIO  
DOE,

*Defendants.*  
-----X

19-CV-04896 (LDH) (ST)

**NOTICE OF DEPOSITION  
PURSUANT TO FED. R. CIV. P. 30**

**NOTICE OF DEPOSITION OF PLAINTIFF ALEJANDRO MANUEL ZAPATA OSORIO**

PLEASE TAKE NOTICE that, pursuant to FED. R. CIV. P. 30, the testimony, upon oral examination of Plaintiff Alejandro Manuel Zapata Osorio ("Plaintiff"), as an adverse party, will be taken before a notary public who is not an attorney, or employee of an attorney, for any party or prospective party herein, and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, via stenographic reporting, at the offices of Rabinowitz, Galina & Rosen, 94 Willis Avenue, Mineola, New York

11501, on the 28<sup>th</sup> day of October, 2020, at 10:00 A.M. in the forenoon of that day.

PLEASE TAKE FURTHER NOTICE that said Plaintiff is required to produce at such examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: All documents, electronically stored information, or objects relating to Plaintiff's employment with any of the named defendants and/or relating to Plaintiff's personal calendar (including, but not limited to, dates of other employment, vacations, illnesses, etc.) for the time period during which Plaintiff was employed by any of the named defendants.

Dated: August 29, 2020  
Mineola, New York

RABINOWITZ, GALINA & ROSEN  
*Attorneys for Defendants*

  
\_\_\_\_\_  
By: Michael M. Rabinowitz, Esq.  
94 Willis Avenue  
Mineola, New York, 11501  
Phone: (516) 739-8222  
[mrabinowitz@randglaw.net](mailto:mrabinowitz@randglaw.net)

TO: Michael Faillace, Esq.  
MICHAEL FAILLACE & ASSOCIATES, P.C.  
*Attorneys for Plaintiffs*  
60 East 42<sup>nd</sup> Street  
Suite 4510  
New York, New York 10165  
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SIGUENCIA ENCALADA, and WILDER  
RODRIGUEZ, *individually and on behalf of  
others similarly situated,*

*Plaintiffs,*

*-against-*

VECTOR STRUCTURAL PRESERVATION  
CORP. (D/B/A VECTOR STRUCTURAL  
PRESERVATION), NORTH STAR  
STRATEGY, INC. (D/B/A NORTH STAR  
STRATEGY), BILL HANDAKAS,  
VASSILIOS HANDAKAS, and SERGIO  
DOE,

*Defendants.*

-----X  
**NOTICE OF DEPOSITION OF PLAINTIFF BRAULIO ROLANDO CASHABAMBA  
CHANGO**

PLEASE TAKE NOTICE that, pursuant to FED. R. Civ. P. 30, the testimony, upon oral examination of Plaintiff Braulio Rolando Cashabamba Chango ("Plaintiff"), as an adverse party, will be taken before a notary public who is not an attorney, or employee of an attorney, for any party or prospective party herein, and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, via stenographic reporting, at the offices of Rabinowitz, Galina & Rosen, 94 Willis Avenue, Mineola, New York

11501, on the 28<sup>th</sup> day of October, 2020, at 12:00 P.M. in the afternoon of that day.

PLEASE TAKE FURTHER NOTICE that said Plaintiff is required to produce at such examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: All documents, electronically stored information, or objects relating to Plaintiff's employment with any of the named defendants and/or relating to Plaintiff's personal calendar (including, but not limited to, dates of other employment, vacations, illnesses, etc.) for the time period during which Plaintiff was employed by any of the named defendants.

Dated: August 29, 2020  
Mineola, New York

RABINOWITZ, GALINA & ROSEN  
*Attorneys for Defendants*

  
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TO: Michael Faillace, Esq.  
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